

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AKAMAI TECHNOLOGIES, INC. and  
AKAMAI SECURITIES CORPORATION,

Plaintiffs,

v.

DEUTSCHE BANK AG,

Defendant.

Civil Action No.:  
1:10 Civ. 10254 (JLT)

**DEFENDANT DEUTSCHE BANK AG'S MOTION FOR PROTECTIVE ORDER**

Defendant Deutsche Bank AG ("Defendant") hereby moves for a protective order, pursuant to Fed. R. Civ. P. 26(b)(2) and 26(c), to preclude the depositions of current and former high-level officers and executives of Deutsche Bank AG and its subsidiary, non-party Deutsche Bank Securities Inc. ("DBSI") (collectively, for the purposes of ease of reference in this motion only, "Deutsche Bank") by Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation (collectively "Plaintiffs" or "Akamai"). In support of its motion Defendant submits contemporaneously herewith its Memorandum of Law In Support Of Its Motion for a Protective Order, and the Declaration of Toby S. Soli, dated August 1, 2011, with attached exhibits.

WHEREFORE, Defendant Deutsche Bank AG respectfully requests that this Court enter a protective order precluding the depositions of Josef Ackermann, Thomas Bowers, Michael Burke, Bill Broeksmit, and Rajeev Misra, and for such other and further relief as the Court deems just and proper.

Dated: August 1, 2011

**RESPECTFULLY SUBMITTED:**

DEUTSCHE BANK AG,  
Defendant,

By its attorneys:

/s/ Toby S. Soli  
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**REQUEST FOR ORAL ARGUMENT**

Defendant believes that oral argument may assist this Court in deciding the issues raised in this motion and, as a result, pursuant to Local Rule 7.1(d), Defendant respectfully requests a hearing on this motion.

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I, Toby S. Soli, hereby certify that we conferred with counsel for Plaintiffs and have attempted in good faith to resolve or narrow the issues contained in this Motion.

/s/ Toby S. Soli

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants on August 1, 2011.

/s/ Toby S. Soli